



Shaping the future for birds

September 25, 2015

Mr. John Pohlman
Wisconsin Department of Natural Resources
PO Box 7921
Madison WI 53707-7921

Dear Mr. Pohlman:

The American Bird Conservancy has completed review of the Draft Master Plan and Environmental Impact Statement for the Sauk Prairie Recreation Area (SPRA). We offer the following comments:

The SPRA is biologically noteworthy for supporting significant populations of grassland, shrub land and savanna-associated bird species, many considered state and national conservation priorities. The significance of the property is underscored by its inclusion in one of only 88 officially designated Important Bird Areas (IBA) in the State of Wisconsin – the Badger Army Ammunition Plant IBA. The size and geographic context of the SPRA offer important opportunities to manage on behalf of priority bird species at a scale conducive to increasing and sustaining their local populations. We commend the Department of Natural Resources (Department) for emphasizing restoration of prairie, shrub land, savanna and oak woodland communities on nearly all of the 3,400-acre property.

We recognize the importance of SPRA for providing outdoor recreation activities. However, given the unique ecological nature of the property, only activities deemed compatible (low impact) with restoration goals as previously committed to by the Department should be accommodated.

To that end, we support decisions to eliminate development of a shooting range and ATV use. We do not consider dual sport motorcycles, model/high powered rockets and year round dog training to be compatible activities and recommend they not be included in the final plan.

Recreational trails can negatively impact ground nesting birds by fragmenting habitat, facilitating predator movement, spreading invasive species and serving as a source of disturbance, particularly during the breeding season. Whether for hiking, horses or mountain bikes, we strongly encourage a thorough impact assessment before adding additional trails to the property. Large blocks of grassland habitat should be maintained as trail free to ensure their long-term integrity as breeding habitat for sensitive species.

Finally, as planning and compatible development of the SPRA continue to unfold, we encourage strong collaboration with other owners of the former Badger Army Ammunition Plant including the Ho-Chunk Nation, the Dairy Forage Research Center and local units of government, to enable conservation-focused, landscape scale management of this remarkable, publically-owned resource.



Shaping the future for birds

Thank you for the opportunity to comment.

Sincerely,

Craig Thompson

Craig Thompson
Great Lakes Regional Director
American Bird Conservancy



Community Conservation

~www.communityconservation.org~

50542 One Quiet Lane
Gays Mills, WI 54631

Phone (608) 735-4717
Fax (512) 519-8494
communityconservation@mwt.net

September 16, 2015

Ms. Cathy Stepp, Secretary and Mr. John Pohlman
Wisconsin Department Natural Resources (WDNR)
P.O. Box 7921
Madison, WI 53707

Dear Ms. Stepp, Mr. Pohlman and others concerned with the Badger lands,

I became interested in the Badger Army Ammunitions Plant (BAAP) lands because Community Conservation had already successfully catalyzed the Kickapoo Reserve in Vernon County and there was some similarity in the methods of land transfer from the federal government. So, I have been involved with the fate of the BAAP lands since 1997 working with Citizens for Safe Water Around Badger (CSWAB), and the initiation of the Community Conservation Coalition for the Sauk Prairie (CCCSP) in the late 1990s that became the Sauk Prairie Conservation Alliance (SPCA).

What transpired from these early beginnings was a community-driven process that established the Badger Reuse Committee which was comprised of 21 members representing a variety of government, NGO, and community groups in 2000. This impressive democratic process emerged with the Badger Reuse Plan in 2001 that was endorsed by Sauk County, the Ho-Chunk Nation, and the Wisconsin Department of Natural Resources, among others. This plan was accepted as the guide for the future of the Badger lands.

The Badger Reuse Committee states - *The BAAP land "presents tremendous opportunities for the protection, and enhancement, use, restoration, and enjoyment of the property's unique natural and cultural features." "These features... can be best maintained... through management of the property as a whole and intact unit,... Future uses ... should promote an appreciation of the Sauk Prairie landscape through education, restoration, research, recreation, agriculture, and other activities that are defined in a reuse plan."*

In order to promote global biodiversity and sustainable land use, Community Conservation, Inc. catalyzes, facilitates and empowers local people to manage and conserve natural resources within the social, cultural and economic context of their communities.

While overall this current Master Plan is good, it does in some ways disregard the 18 year history of a community coming together for a common goal, by emphasizing recreation over protection of natural resources which in the WDNR mission statement begins with *"To protect and enhance our natural resources:"*. Thus, proposing dual-sport motorcycles, snowmobiles, and a rocket launching site are not appropriate as low-impact recreation and would be detrimental to wildlife, especially if they cut through the center of the Badger lands. Although, not directly proposed in the plan, ATVs were mentioned and paintball events were noted to be possible for special events. Again, these types of recreation don't fit and are not conducive or supportive of wildlife, especially species of special conservation concern.

In accordance with the Badger Reuse Committee plan to manage the land as one intact unit, it is very important that the WDNR work closely with the Dairy Forage Research Center and the Ho-Chunk Nation on a property-wide management of the full 7,400 acres together. This means that the plan needs to give more emphasis to prairie restoration and habitat management as was proposed in the Badger Reuse Plan.

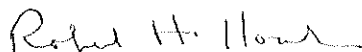
The Kickapoo Reserve has flourished as a natural conservation area; tourism has flourished and the land has been used by tourists and residents alike and it has become a model of community management with a board of community and Ho-chunk members.

Similarly with the Badger lands, the Ho-Chunk have stuck by the original plan and are already working on prairie restoration. Recent information about Dairy Forage stated that they will try and work with the other groups to better effect the original plans set in 2001. These groups are setting a good standard for cooperative management of the Badger lands and I hope that the Wisconsin Department of Natural Resources will honor the natural resources of the Badger lands and the 18 year history that has led to their restoration. I hope, and trust, that the WDNR will not disregard its own legacy and the complex democratic process that transpired, that it participated in along with the many other community players in 2001.

Together with Dairy Forage and the Ho-Chunk they must seek those *"opportunities for the protection, and enhancement, use, restoration, and enjoyment of the property's unique natural and cultural features"* and follow their mission *"To protect and enhance our natural resources:"*

Thank you for considering my comments and I sincerely hope that the Wisconsin Department of Natural Resources will respect their own legacy and continue the plan you and others arrived at in 2001.

Sincerely,



Robert H. Horwich, Ph.D.
Director



September 25, 2015

John Pohlman - LF/6
WI Department of Natural Resources
P O Box 7921
Madison WI 53707-7921

SUBMITTED BY ELECTRONIC MAIL

RE: Joint Organizational Letter Supporting Conservation and Quiet Nature-Based Recreation in the Draft Master Plan for the Sauk Prairie Recreation Area (DNR portion of the former Badger Army Ammunition Plant lands)

Dear Mr. Pohlman:

Located on the South bluff of Devil's Lake State Park and framed by the Wisconsin Riverway, the former Badger Army Ammunition Plant lands represent our largest and most viable opportunity to restore and manage a large-scale forest to grassland transition in Wisconsin.

Scientists and birders are concerned about population declines of many grassland bird species. Since the North American Breeding Bird Survey began in 1966, grassland birds have declined more steeply than any other group of birds in North America and the Midwest. These are the birds found at Badger.

The Driftless Area of Wisconsin, including the Baraboo Hills, is particularly rich in known and potential bat hibernacula sites within easy commuting distance for summer resident bat populations. Military ammunition production and storage bunkers and similar facilities at Badger provide a unique opportunity to help in the recovery of bat populations.

The nearby Baraboo Hills have been designated by The Nature Conservancy as one of the Western Hemisphere's "Last Great Places" by the U.S. Department of Interior as a National Natural Landmark, by the DNR as a Forest Legacy Area and a Conservation Opportunity Area of continental significance, and by the Wisconsin Bird Conservation Initiative as an Important Bird Area. The nearby villages of Sauk City and Prairie du Sac have both earned and sustain Bird City Wisconsin status.

The DNR will be initiating a process to locate a public shooting range in Sauk County. The Sauk Prairie Recreation Area will be among the top contender sites. The potential gun range location at Badger features a complex of remnant prairie, oak woodland, and grassland habitats.

The conservation goals outlined in the DNR plan are to maintain and reestablish the biological richness of Wisconsin's disappearing native prairies, particularly grassland birds. Not only do proposed loud disruptive uses contradict these goals, they are not compatible with other sustainable recreational activities proposed for Badger like biking, family picnics, bird watching, snowshoeing, and hiking, including the nearby Great Sauk Trail.

While we support the WDNR's proposals for ecological restoration, habitat management and quiet nature-based recreation on the former Badger Army Ammunition Plant lands, we do not support proposed on/off-road motorcycles, sport rocketry and a future gun range.

Sincerely,

Laura Olah, Executive Director, Citizens for Safe Water Around Badger

Peter Galvin, Director of Programs, Center for Biological Diversity

Craig Williams, Program Director, Kentucky Environmental Foundation

George Meyer, Executive Director, Wisconsin Wildlife Federation

John E. Peck Executive Director, Family Farm Defenders

Denny Caneff, Executive Director, River Alliance of Wisconsin

Matthew Reetz, Executive Director, Madison Audubon Society

Bill Davis, Chapter Director, Sierra Club - John Muir Chapter

Forest Jahnke, Coordinator, Crawford Stewardship Project

Craig Schlender, Chapter President, Sauk County Pheasants Forever

Dr. Robert Horwich, Director, Community Conservation

Kimberlee Wright, Executive Director, Midwest Environmental Advocates

Kerry Schumann, Executive Director, Wisconsin League of Conservation Voters

Bill Welch, President, Friends of Scenic Lodi Valley

Patricia J. Popple, Editor, Frac Sand Sentinel

Julie Enslow, Facilitator, 350 Milwaukee

Maria Powell, Executive Director, Midwest Environmental Justice Organization

Tim Lopez, Director, Voluntary Cleanup Advisory Board

Dave McCoy, Director, Citizen Action New Mexico

Al Gedicks, Executive Secretary, Wisconsin Resources Protection Council

Gail Lamberty, Rob Nurre, Co-chairs Badger Forward Committee, Sauk Prairie Conservation Alliance

Elaine Swanson, People Empowered Protect the Land (PEPL) of Rosendale

Don Timmerman and Roberta Thurstin Timmerman, Casa Maria Catholic Worker

Dena Eakles, President, Echo Valley Hope

Alison Jones Chaim, Executive Director, Physicians for Social Responsibility Wisconsin

Alex Bryant, Program Director, Wisconsin Environmental Health Network

Respectfully submitted on behalf of the above 26 organizations by:

Laura Olah, Executive Director, Citizens for Safe Water Around Badger, E12629 Weigand's Bay South, Merrimac, WI 53561 Email: info@cswab.org Telephone: (608)643-3124 Website: www.CSWAB.org

CRANES

Capital Region Advocacy Network for Environmental Sustainability

On behalf of its member organizations and individuals, advocating collaboratively for the environment of the South Central Wisconsin region (eight counties: Columbia, Dane, Dodge, Green, Iowa, Jefferson, Rock and Sauk) toward a high quality of life, an ecologically sustainable and just culture, and, the celebration of the beauty of this place, both natural and built.

VISION

The Capital area's environment, including water, land, and air resources, will be conserved or restored to ensure the region's quality of life and the beauty of this special place, for all who live or visit here, now and in the future.

PARTNER ORGANIZATIONS

*Earth/Art® Resources
Friends of Pheasant Branch Conservancy
League of Women Voters - Dane County
Madison Audubon Society
Sierra Club - Four Lakes Group
W. Dane Coalition for Smart Growth & Environment
West Waubesa Preservation Coalition*

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Robbie Webber

CRANES, INC.
POB 3413
MADISON, WI 53704

608.807.0887 tel
CRANESINC.ORG
INFO@CRANESINC.ORG

A Wisconsin Non-Profit [EIN 26-4056421]
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PRINTED ON RECYCLED PAPER

September 25, 2015

John Pohlman - LF/6
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, Wisconsin 53707-7921

RE: COMMENTS ON DRAFT MASTER PLAN FOR SAUK PRAIRIE RECREATION AREA

Dear Mr. Pohlman,

The Capital Region Advocacy Network for Environmental Sustainability (CRANES) appreciates the opportunity to provide public comment on the Wisconsin Department of Natural Resources Draft Master Plan for the Sauk Prairie Recreation Area (SPRA). The decommissioning of the former 7,400-acre Badger Army Ammunition Plant provides an extraordinary, once-in-a-lifetime opportunity to restore a large portion of the once extensive Sauk Prairie to the largest by far native prairie ecosystem in southern Wisconsin. Accomplishing this ecological restoration adjacent to the largest area of southern hardwood forest in the Upper Midwest in the adjacent Baraboo Hills is one of the most significant actions the Wisconsin Department of Natural Resources (WDNR) can undertake to help restore and sustain the ecological health of Wisconsin. The emphasis and focus of the Draft Master Plan must be accomplishing this extraordinary ecological restoration.

Repeatedly throughout the several decades of public discussion and decision making about how to manage the former Badger Army Ammunition Plant the entities involved - WDNR, the Dairy Forage Research Center, the Ho-Chunk Nation, and Sauk County - have committed to collaboratively managing these lands as one integrated landscape. WDNR has years of experience in managing a large wetland ecosystem, the Cherokee Marsh in Dane County, collaboratively with Dane County and the City of Madison. WDNR also collaboratively manages the extensive Horicon Marsh with the U.S. Fish & Wildlife Service. For similar collaborative management of the former Badger lands to succeed the Master Plan for the WDNR portion must harmonize with and complement the plans of the other entities involved. It would be best for all of the managing entities of the Badger lands to develop a joint Master Plan for the entire area.

There should be a greater emphasis on collaboration and cooperation with the other landowners of the former Badger Army Ammunition Plant in the creation of the final Master Plan for the portion of these lands managed by the WDNR. The first value of the Badger Reuse Committee Final Report is to manage the Badger property as a single

unit. WDNR was actively involved in that committee and signed the Final Report. We recognize WDNR has specific responsibilities for master planning and management of the lands under its control, but it has also made specific commitments during the Badger reuse process to work in collaboration and cooperation on planning and management with the other Badger landowners. The expected degree of collaboration and cooperation is not reflected in the creation of this Draft Master Plan nor is it apparent in the future unfolding of this Plan.

CRANES is pleased with the emphasis in the Draft Master Plan on the restoration of nearly all of the 3,400 acres of the Sauk Prairie Recreation Area to prairie, savanna, oak woodlands and other natural community types which were native to this area. This promises to be one of the most extensive prairie and savanna restoration efforts ever undertaken. The restoration of these prairie/savanna/oak woodland communities, in conjunction with the appropriate management of the forest of the south bluffs of the Baraboo Range in Devil's Lake State Park, will provide a large-scale continuum of native habitat types necessary for the survival of many now rare plant and animal species. The extent of these ecosystems will provide an extremely rare recreational and educational opportunity for visitors – to both gaze over vast expanses of prairie and woodland and to be immersed in the midst of a “prairie sea” and a deep forest. With all of the native ecosystems of southern Wisconsin reduced to tiny remnants scattered among vast expanses of agriculture the former Badger land will be the one place visitors can experience a hint of pre-white settlement southern Wisconsin.

The Sauk Prairie Recreation Area is an historic opportunity to provide experiences that used to be common before most of Wisconsin's wild spaces were lost. The location of this area near urban areas makes such experiences possible for the large and growing numbers of city dwellers who most need the refreshment and restoration that will be provided, along with relief from their daily diet of noise.

However, CRANES is troubled by what appears to be an emphasis on recreation over restoration throughout the Draft Master Plan. Does this focus originate from the very name given to WDNR's portion of the Badger lands, the Sauk Prairie Recreation Area (SPRA)? We understand the decision was made to categorize the project as a recreation area, not because recreation was to be the primary use of the land, but because WDNR regulations permit the widest range of land management techniques on a recreation area. In order to undertake the extensive restoration at the SPRA, a full suite of allowable management techniques under the recreation area category is necessary.

An understanding of this reason for the name seems to have been lost. Because the category “recreation area” is included in the name of the property, the Draft Master Plan focuses extensively on recreation rather than restoration. In order to rectify this misunderstanding of purpose and clarify the primary purpose of the property, CRANES suggests that the word “Recreation” be removed from the name of the property and replaced with the word “Conservation,” to call it *The Sauk Prairie Conservation Area*. While not changing the land management administrative category, it would more accurately portray the intent for this property to both the public and to the WDNR itself.

Although we are pleased with the significant commitment to restoration in the Plan, CRANES is concerned about a number of recreation proposals for the SPRA which are not compatible with restoration or with the WDNR's stated commitment to low-impact recreation on this property.

We are pleased that the previously proposed ATV trail has been eliminated, but the suggested use of “dual-sport” motorcycles on equestrian and bicycle trails is equally inappropriate and incompatible, even when allowed only on a limited number of days. While the long-distance shooting range that had been proposed for the SPRA is not specifically included in this Draft Master Plan, the SPRA is still under consideration for such a facility. CRANES urges WDNR to clearly state that a shooting range will not be built at the SPRA. The proposal for rocketry in the Draft Master Plan is also an incompatible recreation activity due to noise, potential contamination, the possibility of user conflicts as well as the risk of a possible unintended fire in a grassland area.

These proposed uses would pollute the area’s entire sound shed, contradicting the Badger Reuse Plan’s emphasis on conservation and low-impact recreational activities, including quiet, nature-based recreation. The impacts on habitat would be enormous, and thus detrimental across the entire property for humans and other animals that are intended to mutually benefit from your otherwise commendable Draft Master Plan. We’ve reminded the WDNR in the past about a most important aspect of your duty to provide for all recreational uses: Not every use needs to be accommodated everywhere.

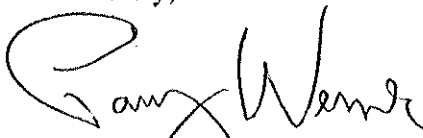
We also hope that the Final Master Plan will prevent– or at least thoroughly regulate– drone overflights, another source of sound shed pollution, and a generally unnecessary intrusion on quiet, nature-based recreation. Research is emerging that aerial noise pollution causes biological stress in animals, even when it is not visually apparent in their behaviors.

While dual sport motorcycles, rocketry and a shooting range should clearly be eliminated from the Master Plan, other appropriate recreational uses could be given greater emphasis to significantly enhance the visitor experience. Primary among them are additional hiking and walking trails. The Draft Master Plan specifically calls for a single, approximately five-mile long hiking trail from the proposed visitor center to the overlook at the northern edge of the property. The Draft Master Plan additionally authorizes up to five additional miles of short loop hiking trails at unspecified locations. CRANES believes the Master Plan should include a well-defined, extensive hiking trail network that would allow for pedestrian access throughout the entire SPRA property.

CRANES endorses and urges your consideration of the more detailed comments submitted by the Sauk Prairie Conservation Alliance, which are attached for reference.

Thank you for your efforts to prepare the draft Sauk Prairie Recreation Area Master Plan. We appreciate your consideration of our concerns and comments and expect WDNR will carefully consider them and other public comments and will improve the Master Plan to have a more appropriate focus on ecological restoration and compatible low-impact recreation.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Werner". The signature is fluid and cursive, with the first name "Gary" and last name "Werner" clearly distinguishable.

Gary Werner, President
CRANES

Sauk Prairie Conservation Alliance

Comments on WDNR's Draft Master Plan and Environmental Impact Statement for the Sauk Prairie Recreation Area (SPRA)

September 2015

This document summarizes the Sauk Prairie Conservation Alliance's issues and concerns with the draft master plan for the SPRA. These comments are based upon and reference the legally binding documents by which WDNR acquired the Badger property, including the Final Report of the Badger Reuse Committee (2001), the National Park Service Application by WDNR to Acquire Surplus Federal Property (2004) and the Regional and Property Analysis for the SPRA (2012).

This review is based on WDNR's pledge to use the property:

- *Focused primarily on ecological restoration and habitat management, while*
- *Providing low-impact recreation, and*
- *Only recreation that is compatible with the restoration goals.*

We offer reasoned and pragmatic alternatives (proposals for improvement) for the activities the Alliance believes are incompatible and/or inappropriate, in order to assure that the Plan closely adheres to the originating documents and WDNR's obligations and commitments contained therein.

I. Ecological Restoration & Habitat Management

The WDNR is to be commended for acknowledging the unique opportunity that SPRA represents for creating a remarkable landscape-scale ecological gradient restoration that transitions from riparian edge to open prairie/grassland to oak opening to oak woodland. The draft plan's long-term (50-year) vision for restoration of the SPRA landscape is well conceived and generally well defined. Unfortunately, the proposed recreation often pre-empts restoration, and in fact in some cases is incompatible with restoration. Priority is clearly given to recreation over habitat management, both in allocation of the land management classification and also in the proposed budget. This approach is not in agreement with the NPS application.

A. Management Area Designations within the SPRA are primarily recreational use (62%) rather than habitat or native community management (34%). Only 17 acres, 0.5

percent of the property, are classified as a Native Community Management Area, yet many acres have historically been found to contain important native species and relict native habitat. The proposed landscape management of the property targets over 90% of the land to ultimately be restored and managed as native communities.

Proposals for Improvement:

1. Place primary emphasis on ecological restoration and habitat management as the core of the SPRA Plan. Create a more equitable balance (e.g., 60-70% or more habitat management) between designated recreational and habitat management areas, and expand native community management to reflect the existence of remnant native community sites. Ideally, the property would have a landscape-scale restoration plan (90+%) within which compatible, low-impact recreation could be subsequently planned.
2. Provide a budget and proposed allocation for habitat restoration in the plan that reflects its high priority within the property. WDNR rightfully argues that immediate habitat management is essential to halt the rapid encroachment of shrubs into former grassland habitat, and an adequate up-front and continuing budget should reflect this urgency.

B. Recreation Area. It is widely understood that designating the publicly-owned property at Badger as a "recreation area" instead of a state park, wildlife area or other public land designation, gave the agency greater flexibility to plan and support ecological restoration while also planning for low-impact and compatible recreation. However, the recreation focus in the Plan has a much greater emphasis than the restoration component. Numerous "I want this" recreation proposals from small special interest groups have continued to creep into the planning process for this property, even up to and including this last draft of the master plan. This property's unique opportunity to vitally function as a restored grassland supporting rare grassland birds and as an Important Bird Area is almost negated if the property serves as a recreation area responding to all special interests.

Proposal for improvement: While the recreation area designation will undoubtedly remain in place, the NAME of the property can be changed to better reflect the ecological value of the site. For example, changing the name to "Sauk Prairie CONSERVATION Area" would be appealing and appropriate, and would fit nicely with the adjoining and nearby protected landscapes. As the Ho-Chunk Nation is considering naming its northwest section of Badger, WDNR should join the Nation in conversation to consider sharing a Native name. This would serve to begin fulfilling Value 1 of the Badger Reuse Committee Report, i.e., to treat the property as a whole.

II. Recreation

Many of the Plan's recreation activities are low-impact and in compliance with WDNR's commitment for use of the property. Some proposed recreation options are high-impact and should be eliminated completely from the Plan. Other proposed recreation activities may be incompatible with ecological restoration and even incompatible with low-impact and "silent" recreation activities. The draft plan appears to be a "catch all" for many types of recreation not permissible in a state park, and special interest groups' pet recreational activities have been inserted into the Plan. Many proposed uses, therefore, are incompatible with other uses. The most ignored users—and arguably the best represented from a demographic perspective—are the many individuals and families who will come to the SPRA for a quiet, peaceful experience in an open grassland landscape. Whereas generally our environment is filled with noise and commotion, solitude and quiet can still be found in a vast prairie. That is the opportunity and attraction of a landscape of this acreage. The Plan, if implemented as it is written today, would greatly impede the quiet appreciation of the SPRA by the majority of users.

A. High Impact Recreation

1. A proposal for a **shooting range** was evaluated more than a decade ago by the Badger Reuse Committee and was scored low according to the consensus criteria. A shooting range was again considered as a recent conceptual alternative for the SPRA. This proposed use of the land is contrary to WDNR's commitment to low-impact recreation, and widespread public sentiment was clearly opposed to a shooting range at SPRA for over a decade.

Proposal for improvement: No further consideration should be given for a shooting range at any time in the future for the SPRA.

2. **ATVs** were initially considered as a conceptual alternative for the SPRA. ATVs clearly represent a high-impact use of the property, and as such, are inappropriate and incompatible with other uses.

Proposal for improvement: No further consideration should be given for ATVs at any time in the future for the SPRA.

3. **Dual-sport motorcycles** are arguably loud, disruptive and can have as much impact on the land (e.g., soil erosion) and the quality of other visitors' experience as ATVs. Motorcycles were never considered as an acceptable recreational activity during the early planning stages at Badger. No matter how limited the proposed use of the property by off-road motorcycles, this is an incompatible high-impact activity that is inappropriate for SPRA. Allowing motorcycle use on trails, even for a short time frame, would keep the door open to increased motorcycle use in the future of the property.

Proposal for improvement: Remove all reference to dual-sport motorcycles in the final SPRA master plan.

4. **Model and High Power Rockets** are a high-impact recreation activity with certain inherent risks. Shooting propellant-fueled rockets from and into a grassland could cause a spontaneous fire upon ignition. Whereas that may be good for the prairie, it represents a significant liability issue for WDNR. Were an errant rocket to land on neighboring DFRC property, permission to access DFRC land to retrieve rockets is not guaranteed, and occasional visitors to SPRA may not be aware of access restrictions elsewhere at Badger.

Proposal for improvement: Remove all reference to rockets from the Plan as an incompatible, high-impact and potentially harmful activity.

5. **Snowmobiles** represent a noisy, high-impact motorized recreational activity and should not be considered as appropriate for the SPRA. The Alliance acknowledges the existence of a historic snowmobile route on the perimeter of the Badger property and would accept formal designation of that trail for land owned by the state. Use of the Great Sauk Trail that runs through the middle of Badger is not acceptable as a snowmobile route. There could easily be snowmobile user conflicts on Ho-Chunk and Dairy Forage Research Center properties.

Proposal for improvement: Support the BOMC-endorsed creation of a permanent snowmobile trail along the perimeter of the SPRA and oppose any snowmobile trail suggested for the interior of the Badger property on or adjoining the Great Sauk Trail.

6. **Wisconsin National Guard Helicopters.** The training flights by Wisconsin National Guard helicopters over and landing on the SPRA are not recreational and are a high-impact activity within the property. Furthermore, the flights may be in direct conflict with recreational users on the SPRA, especially those individuals who enjoy "silent sports" and who desire a quiet peaceful place to get away from urban noise. Furthermore,

there are inherent risks in flying military aircraft over a publicly used landscape. Finally, the Plan does not reference any environmental impact analysis of military activities (e.g., flight paths, noise, soil disturbance, dust, night operation, safety concerns, and procedures in case of a crash).

Proposal for Improvement: WDNR should no longer allow military helicopter flights over the property once the master plan has been approved. Should WDNR decide to continue to allow helicopter flights, the agency should collaborate with the Guard on development of an extensive environmental document (EA or ER) to assess the impacts of military use of the SPRA and enter into an agreement that limits use and mitigates impacts based on the EA.

B. Other Recreation

1. **Hunting.** The proposed hunting season for the entire property is October 15 to May 26, corresponding with the end of the six turkey seasons. SPRA is not a wildlife area, but a recreation area. The use of the property by those seeking silent recreational endeavors should not be compromised by fear of interactions with hunters nearby nor the sound of gunfire throughout an extended hunting season. The sound of gunfire carries a considerable distance over an open grassy landscape; WDNR has not shown that it has undertaken acoustic studies to determine the impacts of hunter gunfire to the experience of other users on the property.

Proposal for Improvement: Limit hunting season on the property from November 15th until May 1st. This more abbreviated hunting season allows for all fall and spring hunting with the exception of three turkey seasons, while simultaneously accommodating outdoor recreationists (bikers, hikers, horse riders) during some of the best times of year—fall and spring—who desire a quiet and peaceful natural experience.

2. **Dog Training.** A 72-acre dog training area is proposed for the farthest southwesterly area of the Magazine Area adjoining DFRC land, but there has been no presentation of need in any Badger land management or planning forum for such an exclusive use area. Dog training/trialing was never considered through the 18 years of planning at Badger. Therefore, this new proposal appears to be inserted to appeal to a late-entry special interest group. This activity requires the discharge of firearms with every training event, which can, according to the Plan, "provide a high-quality, year-round experience" on the site. The Alliance sponsored an acoustic study in 2014 which concludes that grassland bird nesting may be negatively impacted by the shooting of

firearms. DNR has not evaluated the potential impacts of gunfire noise on nesting birds, nor has it done its own acoustic study to determine the impact to "silent sport" recreationists elsewhere on the property. Consideration needs to be given to the impact of gunfire upon grazing cattle on the adjoining DFRC property. Another consideration is gunfire impact on unleashed dogs adjoining the training site. Many dogs are expressly alarmed at gunfire, and tend to flee from loud noises. At the present time two adequate dog training/trialing areas exist within 20 miles of the Badger property (Mazomanie & Pine Island, both with vast acreages). Obviously there is more than adequate opportunity in the area for dog trainers in southern Wisconsin.

Proposal for Improvement: Remove the proposed dog training area from the Plan until WDNR undertakes a thorough needs analysis and an acoustic assessment of noise impacts on rare grassland species, visitors and unleashed dogs. Include a proposal for seasonally limited dog training only after impacts are assessed and only if DFRC concludes that dog training represents no conflict to their operation. Restrict dog training to dates outside of grassland bird nesting season and to the more limited hunting season proposed.

3. **Mountain Bikes.** Mountain bikes can have a significant and adverse impact on trails, causing erosion on steep grades and certain soil types. The draft plan offers no consideration for analyzing potential negative short-term and cumulative impacts of mountain bikes, nor is there a process in place to review and mitigate any future cumulative impacts due to the use of mountain bikes.

Proposal for Improvement: The Plan needs to demonstrate that the agency has studied the potential cumulative impacts from mountain bikes and has included a process to review and mitigate those impacts if they occur. If mountain biking is included in the final plan, care should be taken to avoid the steepest slopes and the most erodible soils on the property. Mountain bikers will undoubtedly want any SPRA trail(s) to continue into Devil's Lake State Park, and any planned trails should be done with an eye toward this future request and potential impacts.

4. **Horses.** As with mountain bikes, horses can also have adverse impacts on trails, especially after a rain event when hooves can tear a grassy substrate and lead to soil erosion and muddy pockets on the trail. Invasive species often are spread on horse trails by seeds carried in horse droppings. The plan does not consider the cumulative impacts of horses on trails, nor does it address a process for mitigating damage done by horses.

Proposal for Improvement: The Plan needs to demonstrate that the agency has studied the potential cumulative impacts from horses and has included a process to review and mitigate those impacts when they occur. Any horse trails included in the final plan should avoid the steepest slopes and the most erodible soils on the property. If horse trails become badly eroded, WDNR should be prepared to close trails indefinitely, or until the damage has been mitigated.

5. **Special Events.** The Alliance is pleased that WDNR staff described, at the September 10, 2015 public hearing, some possible special events that might be considered for approval on SPRA. As written, special events may be proposed for a portion or all of the SPRA. A special event permit would exclude all other users of that portion of SPRA for up to five, four-day weekends a year, or potentially more days if some events are held on weekdays. Exclusive use given to a special interest group is inherently unfair and unjustifiable, as it would block general public access to a portion of the property for the normal suite of recreation uses. The Alliance has a 17-year history of helping with management and restoration of the "Hillside Prairie" within the Magazine Area that is designated in the Plan for special events. It is very possible that volunteer work days at the Hillside Prairie could be in conflict with proposed special events, and access to the volunteers could possibly be denied. With limited staff, extremely limited funding and an admission that WDNR will not oversee special events, WDNR should simply avoid inclusion of any special events in the Plan. The agency's limited resources are better used for its core mission: to protect and enhance our natural resources.

Proposal for Improvement: The Alliance disagrees fundamentally with the creation of any and all "exclusive use" areas on the SPRA, as that would limit citizen access to portions of the property on any given day. Some individuals may prefer spending time in the Magazine Area, and they have the right to do so. "Special events" are of extremely questionable value to this property and could conflict with other acceptable recreational uses. Reference to a special events area should be eliminated from the Plan. Instead, the Magazine Area in its entirety should be incorporated into the diverse trail system proposed for the other segments of the SPRA, with a focus on hiking trails. If WDNR elects to keep special events in the Plan, it should also include a listing of specific acceptable special events and WDNR should strictly adhere to those limited uses. Furthermore, special events should be limited to no more than a total of 6 days/year.

6. **Hiking Trails.** While it is understood that the placement of trails in the draft master plan is conceptual only, the Plan gives disproportionate priority emphasis to proposed horse and street bike trails over hiking trails. It is perhaps assumed that hikers will want

to walk on horse trails or street bike trails, but this may not necessarily represent the interests of the hiking population. There can be conflicts and unsatisfactory visitor experiences if different types of users (e.g., hikers & horses) are on the same trails; hikers may tend not to use trails used by horses or bikes. Hikers undoubtedly will represent the largest demographic of users at Badger, as is observed at Devils Lake State Park and virtually all state parks in Wisconsin. One of the original goals with the WDNR's unusually-shaped property was to connect Lake Wisconsin to the Baraboo Bluffs, and eventually to Devil's Lake. That corridor should support a hiking trail network, providing access to all segments of the SPRA property. Arguably, hiking trails are the easiest to build and maintain compared to other trails. In light of a very limited anticipated budget for the property, WDNR could accommodate a large number of recreationists at SPRA for modest funding by planning a lengthier hiking trail network.

Proposal for Improvement: Expand the number of miles of hiking trails, and develop an extensive network of hiking trails that are independent from other trail uses. Additionally, due to the large size and potential isolated recreational experiences at the SPRA, manage at least some areas for the more primitive types 1 and 2 recreation.

7. **Drones.** Although the use of drones is, for the time being, not allowed on state land, the possibility exists that this recreational use, becoming ubiquitous across the country, will experience a groundswell of support and an interest in flying drones at the SPRA.

Proposal for Improvement: WDNR should be pro-active in anticipating this potential (inevitable?) future recreational interest at SPRA and include reference to a clear process and procedure for reviewing and evaluating any such proposed drone use on the property. There could be potential harm to grassland nesting birds, for example, if drones are flown during the breeding season.

III. Infrastructure & Management

A. Visitor Center/Office. The 2001 Badger Reuse Plan, to which the WDNR is a signatory, very specifically states that the Badger lands, whoever their eventual owners might be, should be *managed as a single, cohesive property*. In its application to the National Park Service, the WDNR stated it would plan for the entire Badger lands and not just their own portion of the property. The WDNR's plan for the SPRA is a stand-alone document that includes few references to the plans of other Badger landowners. There is little reference to future collaboration with other landowners on issues of mutual interest. The most obvious omission is lack of consideration for a combined visitor center/museum to serve visitors to all of the

Badger lands. The Badger Reuse Committee, in its Final Report (2001), envisioned a single "centralized museum/visitor center and multi-use educational facility" to serve the needs of all future landowners and their constituent visitors.

Proposal for Improvement: WDNR needs to partner with Ho Chunk Nation and the Dairy Forage Research Center, to plan, seek funding for, and construct a large centrally located, easily accessible visitor center /museum with extensive interpretive exhibits and adequate office space for each landowner. Clear reference to such a collaboration should be included in the final plan.

B. Parking Area/Amphitheater. The draft plan proposes a large parking area (50 spaces) and amphitheater at the most northern portion of the SPRA property, near the water reservoirs. Understandably, the removal of the reservoirs will ultimately leave a large gap, but a large parking lot is not an imaginative use of this special site. Certainly, there will be visitors interested in visiting the overlook area, but it is unclear that many people would drive the distance to attend an event at such a remotely sited amphitheater.

Proposal for Improvement: An amphitheater, if deemed necessary, could be better sited adjoining or near the visitor center, wherever that is eventually located. Similarly, a larger parking area should be planned for near a (shared) visitor center with a concurrent reduction in the size of the parking area where the reservoirs are now.

C. Budget. The draft plan offers only limited clarity of potential costs, and the costs of restoration are not expressly and clearly stated.

Proposal for Improvement: The final plan should include a well-defined budget that clearly demonstrates priority activities, staffing needs, infrastructure and a timetable for implementation. Arguably, as WDNR has identified, extensive restoration work needs to be implemented in a short time span to begin to address the encroachment of aggressive invasive shrubs into grassland habitat. This should be given high priority, even before recreation infrastructure is put in place. The budget and timeline should reflect this priority.

D. Collaboration. While this draft plan addresses some opportunities for problem solving with adjacent land owners, Ho-Chunk Nation and Dairy Forage Research Center (e.g., Otter Creek flood issues), it neglects to include and identify plans for landscape-scale collaboration on a multitude of activities, together with the co-

owners of the Badger lands. Most importantly, it does not fulfill one of the primary conditions of the transfer of this property, to manage the property as a whole.

Proposal for Improvement: Develop a clear and thoughtful new section of the Plan that addresses areas of collaboration with the other landowners at Badger, thereby treating all 7,400 acres as a property of the whole. This narrative and plan should include property-wide planning of infrastructure (roads, trails, visitor center, interpretation sites, etc.), ecological restoration, scientific and historical research, and education, among other shared themes and interests.

Each of the suggested improvements that we offer to WDNR's draft master plan will benefit the people of Wisconsin and this unique property. We whole-heartedly support and endorse WDNR's statement in the Plan:

"Based on this report's findings, the best overall functional role for the Sauk Prairie Recreation Area is to fulfill the highlighted ecological opportunities available while maximizing compatible recreation opportunities. This approach also takes into consideration the nine key values identified in the Badger Reuse Plan, approved by the Sauk County Board in 2001."

We concur with WDNR's acknowledgement of the once-in-a-lifetime opportunity this property represents to the citizens of Wisconsin. We should not view ourselves as consumers of this landscape, but rather as its caretakers. It is our responsibility to heal this land that has been so mistreated in the past. We stand with WDNR to fulfill this landscape's highest and best ecological opportunities while offering low-impact recreation to our many citizens.



DNR

SEP 02 2015

OFFICE OF THE
SECRETARY

Wisconsin Natural Resources Board
c/o Laurie J. Ross, Board Liaison
PO Box 7921
Madison WI 53707-7921

September 1, 2015

Dear DNR Board Members,

I write on behalf of the 3,000 members of the Madison Audubon Society to respectfully ask that you support the plan for the management of the new Sauk Prairie Recreation Area with two changes to the version that awaits your action.

Most of our 3,000 members live within an hour of this area. Sauk County is already an important area for birds and those of us who love them, with the songbird habitat provided in the Baraboo Hills and the spectacular winter habitat for bald eagles along the Wisconsin River. We are also devoted to the restoration of our native grasslands and our native birds that depend on that habitat. Accordingly, we have closely followed the Department's efforts to work with local conservationists, the federal government, and the Ho Chunk Nation in planning for the restoration and management of the former Badger Ammunition Plant.

The plan before you takes wonderful advantage of the opportunity to restore prairie and grassland birds. Among the many benefits of doing so will be to add another reason for serious birders and anyone who loves birds to visit Sauk County.

However, we believe that the plan's inclusion of recreational rocketry and motorcyclist use of some trails on some days is incompatible with the restoration of those habitats and species and the other quieter recreational activities permitted by the plan. We also believe those two activities conflict with the management of the property as called for in the federal agreements which made the land available to the state.

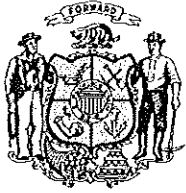
Thank you for the countless hours you and your staff have spent on the development of this plan. Please consider approving it without permitting rockets and motorcycles. Thank you for your consideration of our request.

Sincerely,

A handwritten signature in dark ink, appearing to read "Matthew Reetz".

Matthew Reetz
Executive Director

1400 East Washington Avenue, Suite 170
Madison, Wisconsin 53703
608.255.2473



State of Wisconsin \ NATURAL RESOURCES BOARD

September 4, 2015

Matthew Reetz, Executive Director
Madison Audubon Society
1400 East Washington Avenue, Suite 170
Madison, WI 53703

Dear Mr. Reetz:

Your letter has been distributed to all Natural Resources Board members for their consideration. On behalf of the Board, I would like to thank you for your input regarding the Sauk Prairie Recreation Area draft master plan.

Please feel free to contact the Natural Resources Board in the future with additional comments or concerns.

Best regards,

A handwritten signature in cursive script, appearing to read 'Preston D. Cole'.

Preston D. Cole, CHAIR

PRESTON D. COLE, CHAIR
841 N. Broadway, Room 501
Milwaukee, WI 53202

TERRY N. HILGENBERG, VICE-CHAIR
P. O. Box 555
Shawano, WI 54166

GREG KAZMIERSKI, SECRETARY
N13 W28400 Silvermail Road
Pewaukee, WI 53072

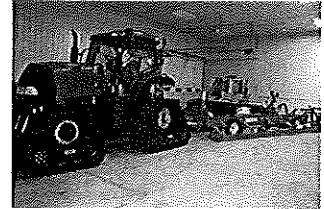
JULIE ANDERSON
14200 Washington Avenue
Sturtevant, WI 53177-1253

WILLIAM BRUINS
N2899 State Highway 49
Waupun, WI 53963

DR. FREDERICK PREHN
413 Jefferson Street
Wausau, WI 54403

GARY ZIMMER
P. O. Box 116
Laona, WI 54541

SNOWMOBILE TRAILS OF MONROE COUNTY



Monroe County Wisconsin

www.monroetrails.com

13-September-2015

RE: Sauk Prairie Recreation Area

Mr. John Pohlman,

Snowmobiling in Wisconsin has been, and continues to be a sport enjoyed by many individuals and families from within the state as well as out of state visitors for over 50 years. Early on, the passion of snowmobilers was the energy that helped to organize the snowmobile clubs that created local trails which then lead to the creation of the in-state trails network that connects communities throughout Wisconsin. Today, we are equally engaged in maintaining this network so that we, and others, can enjoy many of the winter treasures that Wisconsin offers.

You can draw parallels between local snowmobile clubs and "Friends Groups". Both exist to preserve, protect, promote and enhance trails and recreation. My family has been involved with the local snowmobile clubs since I was a child and I am passing the tradition down to my children. We believe in sharing our natural resources in a sound and responsible manner that ensures a future for all.

I have had snowmobiles for over 40 years and have ridden in our great state network for many of them. Many of us snowmobilers enjoy riding from our homes to destinations throughout the state and not always taking the shortest route. We like to include scenic areas along the way like the ones state lands provide.

We ask that there be a permanent snowmobile route provided within the SPRA that connects to the continuing statewide snowmobile trail system outside of the property. Any route must be shown both within the SPRA Master Plan language and on the SPRA Master Plan map.

Thank You for your consideration. Sincerely,

Jason Guthrie

Jason Guthrie

Monroe County AWSC Representative

401 North Oakwood Street Tomah, Wisconsin 54660



AWSC

www.awsc.org



The Nature Conservancy in Wisconsin
633 West Main Street
Madison, Wisconsin 53703

tel 608/251-8140
fax 608/251-8535
nature.org/wisconsin

September 24, 2015

Mr. John Pohlman – LF/6
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, WI 53707-7921

Re: The Nature Conservancy's comments on the Draft Master Plan for the Sauk Prairie Recreation Area

Dear Mr. Pohlman,

The Nature Conservancy (TNC), on behalf of its 20,000 members in Wisconsin, would like to take this opportunity to provide our comments on the Draft Master Plan and Environmental Impact Statement (EIS) for the Sauk Prairie Recreation Area. We thank you for the opportunity to help thoughtfully plan and restore an area as significant in size and ecological value as the former Badger Army Ammunition Plant (BAAP). As a partner with the Wisconsin Department of Natural Resources (WDNR), we hope our comments are just the beginning of the conversation and many years of collaboration in the design and management of this gem.

The WDNR's *Sauk Prairie Recreation Area: Draft Master Plan & Environmental Impact Statement* recognizes and discusses the site's ecological significance and capability, particularly for landscape-scale management and conservation values. It is a big improvement over previous plans and we congratulate you for that. A substantial portion of the SPRA has the potential to be restored and managed as a complex of dry prairie, surrogate grassland, oak savanna, and oak woodland habitats. These ecological communities provide critical habitat to an array of rare and declining species, particularly grassland and shrubland birds, a group of species of critical conservation need in Wisconsin. The opportunity to restore and maintain a large, unfragmented block of habitat—particularly an area supporting the impressive array of biodiversity already known to exist on the property—is unparalleled in southern Wisconsin. With this in mind, we encourage the WDNR to carefully consider the true compatibility and potential impacts that some of the proposed recreational uses may have on these habitats, and, for the uses that are ultimately approved, site them accordingly.

The rich array of outdoor recreation opportunities found in Sauk County make it a destination for hikers, bird watchers, hunters, anglers and naturalists from around the country. If appropriately and wisely managed to enhance the ecological attributes that make the SPRA so special, this site can significantly benefit the entire region's biological and economic vitality without compromising its ecological integrity and biological diversity, as well as its unique historical and cultural identity.

In that light, we offer the following 8 specific suggestions to help strengthen the plan:

1. The cumulative impacts of dual-sport motorcycles and rocketry are unknown – even on a very limited basis as proposed in the plan. Their effect on the birds and other wildlife could be very damaging. TNC does not support these activities in light of the Badger Reuse Plan and its support for low-impact recreation. If, counter to the vision of the Badger Reuse Plan, they are approved in the SPRA Plan, effort needs to be made to thoroughly evaluate the impacts of these uses and it will be important to restrict them to certain times of the year when they will not affect nesting birds. Siting them in areas that will not affect other recreationists and wildlife will also be critical.
2. Utilizing existing infrastructure, like the remaining concrete blast shelters for bat habitat, is a novel and exciting approach. This is a great idea and TNC commends and supports the Department for thinking outside of the box to address pressing wildlife needs like those faced by bat populations in the wake of white nose syndrome.
3. If dog training is approved in the Plan, we support keeping it located and confined at the south edge of the property. Periods of use should be thoroughly evaluated to limit impacts to rare grassland birds during breeding and nesting season.
4. Likewise, if equestrian trails are approved, we suggest the trailhead be kept at the edge of the property and attention be given to evaluating how soil erosion and the spread of invasive species from these recreational uses will be abated.
5. We encourage actively managing the SPRA, to the fullest extent possible, to maximize the uncommon opportunity to restore a large scale grassland to forest transition landscape. We also encourage any proposed infrastructure (visitor center, parking lots, viewing areas) be established with thought given to reducing habitat fragmentation and being able to manage the property as a whole. Woody shrub encroachment is currently the most pressing threat to the ecological integrity of the grassland to oak woodland continuum, and we suggest the WDNR make a concerted effort to address this management challenge as expediently as possible. Over time, removal of pine plantations that fragment grasslands and restoration of these areas to native grassland and oak opening species is highly desirable.
6. Potentially the most difficult, and likely expensive, project would be to re-establish the natural hydrology from the bluffs through the woodlands and onto the grasslands. However, we believe bringing the water flows back to their natural states and eliminating diversion of runoff from the north bluff across Highway 12 is a goal well worth pursuing.
7. This area has a uniquely rich history, unlike any other place in the world. We encourage the pursuit of any plan or opportunity that pays homage to the geologic, cultural and historical aspects of the property and marries conservation with these interests. Doing this may increase the attractiveness of the SPRA to a completely different group of new users to WDNR properties.
8. We encourage using creative avenues for restoration projects, especially given the limited funding the WDNR will have to implement restoration and management on this site for years to come. TNC is open to exploring opportunities for partnerships with WDNR and others to help in prescribed burning, invasive species management and ecological monitoring. However, we do feel that priority should be given to the restoration of the grasslands area over the razing of the reservoirs. We feel that investment should be focused on restoration in priority areas soon before the shrub encroachment issue becomes even more expensive to address the northern section of the proposed SPRA offers further opportunities as it transitions from grassland to the forested south slopes of Devil's Lake State Park. The property's bedrock glade and oak woodlands support

habitat for another suite of rare plant and animal species. We strongly agree with the WDNR's *Draft Property Analysis* when it states "Restoring these historically fire-dependent communities to a more natural state would allow for a gentle transition zone between the vast, closed canopy forests of the Baraboo Hills and the expansive grasslands of BAAP."

As a whole, the Sauk Prairie Recreation Area will continue to provide an important wildlife corridor between the Lower Wisconsin Riverway and the Baraboo Hills—both areas that have been the focus of conservation activities for decades, and that constitute some of the state's most significant areas for biological diversity. The avenue of connectivity which the Sauk Prairie Recreation Area will continue to provide between the natural communities found along the Wisconsin River corridor and the Baraboo bluffs will become ever more important as fragmentation from the pressures of development and other land uses will undoubtedly continue in the future.

Finally, we continue to encourage the WDNR to chart a course for the SPRA that is guided by the vision of the *Badger Reuse Plan*, to which the WDNR was a signatory. Through the time and dedication of a diverse group, the *Badger Reuse Plan* was developed over many years and provides many sound recommendations for the future of the proposed SPRA. Quoting the executive summary:

"The conversion of the Badger lands provides remarkable opportunities for the protection, enhancement, use, restoration, and enjoyment of the property's unique natural and cultural features. In its work, the BRC has sought to highlight these opportunities, and to achieve a realistic, community-based, consensus vision for realizing them. In the past, the Badger lands have too often been a place of division, pain, and conflict. It is the hope of the committee that all members of our community may now contribute to a new beginning at Badger, one that honors the past while serving future generations."

You have taken great strides forward and TNC applauds you. Again, we appreciate the opportunity to comment on the Draft Master Plan for the Sauk Prairie Recreation Area, and we look forward to continuing to work with the WDNR in protecting and celebrating the wealth of conservation opportunities at this unique site. Please contact Ann Calhoun, 608-356-5300, if you have any questions.

Sincerely,



Mary Jean Huston
Wisconsin State Director

cc: Ann Calhoun
Matt Dallman
Steve Richter
Todd Holschbach
Paul Heinen

Mr. John Pohlman
Wisconsin Department of Natural Resources
PO Box 7921
Madison, WI 53707-7921

RECEIVED
SEP 25 2015
FACILITIES AND LANDS

Dear Mr. Pohlman:

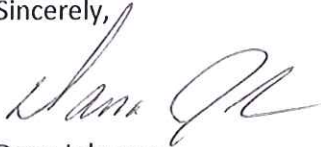
The Nonmotorized Recreation and Transportation Trails Council has reviewed DNR's proposal to include within the master plan for the Sauk Prairie Recreation Area a repurpose of many of the bicycling and equestrian trails during certain periods for use by dual-sport motorcycles. This would close the trails to the normally designated users during those periods.

By unanimous vote at its meeting on 16 September 2015 the council is stating its opposition to the introduction of dual-sport motorcycles on any nonmotorized trails in the Sauk Prairie Recreation Area, including the proposed Great Sauk Trail.

This action came after council members held a lengthy discussion on this issue and concluded allowing dual-sport motorcycles capable of speeds of up to 80 mph will degrade, both physically and in terms of general public desirability, these trails through erosion to a point at which they will be rendered unusable by bicyclists, equestrians, hikers, bird watchers, and other persons studying nature, while also disrupting efforts to preserve habitat and wildlife in the area. This is the nonmotorized constituency the council was created by statute to represent, with members appointed and serving at the pleasure of the governor.

Members of the council feel this, if approved at Sauk Prairie, embodies a precedent that will adversely impact other projects yet to come.

Sincerely,



Dana Johnson
Council Chair
Non-Motorized Recreation and Transportation Trails Council
dana@openleafx.com
262-853-8996



ThePrairieEnthusiasts.org

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September 20, 2015

John Pohlman – LF/6
Wisconsin DNR
P.O. Box 7921
Madison, WI 53707-7921

Dear Mr. Pohlman:

The Prairie Enthusiasts (TPE) is a non-profit organization that seeks to ensure the perpetuation and recovery of prairies and oak savannas in Wisconsin, Minnesota and Illinois through protection, management, restoration and education. As an organization, we strongly support the overall goals of the Draft Master Plan for the 3,400-acre Sauk Prairie Recreation Area created from the former Badger Army Ammunition Plant. The DNR has crafted a well-conceived, long range plan for the ecological restoration of a substantial fraction of this globally important, landscape-scale prairie ecosystem, and TPE greatly applauds this extraordinary effort.

In addition, TPE is highly supportive of the use of this site as a recreation area. A major part of our mission as an organization is to encourage members of the general public to experience first-hand these now rare and extraordinary natural communities. Both the large scale and the outstanding location of this site make it extremely attractive for this purpose, and we very much wish to encourage the concept of developing the site for the many low-impact recreational uses which are compatible with ecological restoration.

A number of the proposed activities on the site, however, clearly do not fit the definition of low-impact recreational uses compatible with ecological restoration. Specifically, we are strongly opposed to any use at any time of motorized vehicles such as motorcycles on the proposed biking and horse trails. One of the unique characteristics of this site is the extremely rare opportunity it provides to experience an open, natural prairie landscape without the presence or noise of motors and other human-made sounds. In addition, an important aspect of experiencing and understanding prairies is to be able to see the rare and unusual plant communities at close hand, and motorized vehicles can be extremely damaging to the rare plant life along the trails. For similar reasons, we are also opposed to the proposed rocketry range.

In general, we are very excited and impressed with the draft and how the DNR has worked with such a broad range of interested parties to develop a plan with such strong potential for combined high conservation value and public recreational use. A critical element of this long-term negotiation, however, has been the focus on the restoration of this rare and important part of our natural heritage and the careful selection and development of compatible recreational uses. We sincerely hope that the DNR will maintain its original commitment to this critical principle as it finalizes the plan.

On behalf of the TPE Board of Directors and staff, sincerely yours,

Scott Fulton
Vice President
The Prairie Enthusiasts

Grassroots conservation at work

110 S. Main St. P.O. Box 824, Viroqua, WI 53701
(815) 541-3494 executivedirector@theprairieenthusiasts.org



Rock County Multi-Use Trail Group

Diane Papcke

1908 Monague Rd.

Milton WI 53563

September 8, 2015

John Pohlman - LF/6

WI Department of Natural Resources

P O Box 7921

Madison WI 53707-7921

Dear John:

I would like to comment on the Sauk Prairie Recreational Area Master Planning. I am representing the Rock County Multi Use Trail Group, We have a membership of over 75 people all who enjoy trail riding. The SPRA is within an easy drive from our area. As horse owners we are always looking for properties that offer multi use trails.

In looking over the master plan we are happy to see that equine trails have been included in the draft. There are just a few points that I would like to suggest,

Parking for 10 trailers would often times fill quickly, please consider locating the parking where this space could be expanded once the use is taken into consideration.

The rocketry area could cause user conflicts, I see that it is only listed for 10 days a year, but if horses are on the trail during that time, there is a great potential for spooking horses.

Would it be possible to consider expanding the equine trails to include the outside loop of snowmobile trails? At the SKM unit these 2 user groups have quite a bit of overlap, and seems to work well. It would also allow SPRA to be more of a destination trail with the extra mileage.

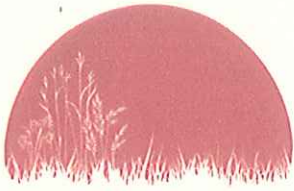
Thank you for your continued support of multi-use trails in the SPRA. We look forward to enjoying the scenic beauty of the area.

Sincerely,

A handwritten signature in blue ink that reads "Diane Papcke".

Diane Papcke

Rock County Multi Use Trail Group



The Sauk Prairie Conservation Alliance

PO Box 403 • Baraboo, WI 53913-0403 • www.saukprairievision.org

September 23, 2015

John Pohlman – LF/6
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, Wisconsin 53707-7921

Dear Mr. Pohlman,

The Sauk Prairie Conservation Alliance appreciates the opportunity to provide public comment on the Wisconsin Department of Natural Resources Draft Master Plan for the Sauk Prairie Recreation Area. This cover letter, together with the enclosed comments document, represents the Alliance's response to the draft plan and recommendations for improving the Plan. Additional comments addressing the draft plan from a legal perspective will be made on the Alliance's behalf by our attorney Brian Potts of Foley & Lardner.

The Sauk Prairie Conservation Alliance has been involved with the process of determining the future use of the former Badger Army Ammunition Plant lands for nearly two decades, since the decommissioning of the facility was announced in 1997. In 2000 and 2001, we served on the Badger Reuse Committee which, by consensus, agreed to nine values for the future of the property, and criteria for assessing uses and management of the Badger lands based on those values. Since its beginning in 2006, the Alliance has been an active stakeholder member of the Badger Oversight Management Commission, which has the mission of ensuring that the vision of the Badger Reuse Plan is realized. Alliance members have attended and participated in countless hours of meetings of these and other committees, commissions and boards that have had a role in determining the future of the Badger lands. At all these meetings, we have worked alongside representatives of the WDNR, other land owners and interested citizens to create the best future for that land commonly called "Badger."

In addition to these planning efforts, the Alliance has been actively involved with hands-on restoration on several areas of the Badger lands for many years. For at least ten years we have led the efforts to restore what is considered to be the best remnant of original prairie at Badger, the Hillside Prairie. This restoration work began while this property was still under the control of the U.S. Army, and has continued since the land was transferred to the State of Wisconsin for management by the WDNR. Hundreds of hours of volunteer efforts have gone into this restoration project, and many dozens of volunteers have been involved in these efforts. We initiated the creation of the Fordham Prairie that is on land now owned by the Ho-Chunk Nation, and we have worked diligently on the Kindschi Prairie as well as other restoration efforts on the Badger lands.

The Sauk Prairie Conservation Alliance
Working for a New Future for the Sauk Prairie on the Badger Lands.

The Alliance has facilitated numerous public education programs including a ten-evening lecture series spread over three months in the winter and spring of 2000 covering all aspects of the natural and cultural history of the Sauk Prairie. We have coordinated countless field trips for both adults and children at Badger. Only recently, we organized a day-long "Sauk Prairie Day" that featured speakers about the Sauk Prairie and a field trip to remnants of the prairie. Approximately 150 citizens interested in the Sauk Prairie, its history and its future, attended that event.

All of this clearly demonstrates a long-term commitment, significant engagement, and a deep understanding of the issues related to the future of the Badger lands by the Alliance.

The Alliance's priorities for the Badger lands have been consistent for many years: to provide for the restoration of the native prairie and savanna; to support compatible, low-impact recreational opportunities that allow visitors to enjoy and learn from the natural and cultural features of this land; and to ensure that the Badger lands be cooperatively and collaboratively managed by the landowners.

The Alliance has focused its analysis and the resulting comments on the Plan based upon the commitments, values and information found in several guiding documents created during the nearly two-decade process of determining the reuse of the former 7,400-acre Badger Army Ammunition Plant. While these guiding documents are extensive and detailed, three critical statements encapsulate the guidance review of the Plan. These are:

"The conversion of the Badger lands provides remarkable opportunities for the protection, enhancement, use, restoration, and enjoyment of the property's unique natural and cultural features. In its work, the BRC has sought to highlight these opportunities and to achieve a realistic, community consensus vision for realizing them." And "The Badger property is [to be] managed as a single unit. The managers and owners of land and activities have an affirmative, formal obligation and written agreement to manage the property collaboratively and holistically, and to empower local stakeholders in identifying, discussing, and influencing major management and long-term use decisions."

The 2001 Final Report of the Badger Reuse Committee (also known as the Badger Reuse Plan).

"Many groups with varying interests in Badger share a common goal with WDNR to convert it to a recreational property with low impact recreation (hiking, picnicking, primitive camping), prairie, savanna and grassland restoration, environmental education and cultural/historical interpretation with potential for an education center."

The 2004 WDNR's application for lands at Badger under the National Park Service's "Federal Lands to Parks" program.

"Based on this report's findings, the best overall functional role for the Sauk Prairie Recreation Area is to fulfill the highlighted ecological opportunities available while maximizing compatible recreation opportunities. This approach also takes into consideration the nine key values identified in the Badger Reuse Plan, approved by the Sauk County Board in 2001."

The 2012 WDNR's Regional and Property Analysis: Sauk Prairie Recreation Area.

Based on the Alliance's review of the Plan, we are pleased with the emphasis on the restoration of nearly all of the 3,400 acres of the Sauk Prairie Recreation Area to prairie, savanna, oak woodlands and other natural community types which were native to this area. This promises to be one of the most extensive prairie and savanna restoration efforts ever undertaken. The restoration of these prairie/savanna/oak woodland communities, in conjunction with the appropriate management of the forest of the south bluffs of the Baraboo Range in Devil's Lake State Park, will provide a large-scale continuum of native habitat types necessary for the survival of many now rare plant and animal species. The Sauk Prairie Conservation Alliance commends the Wisconsin Department of Natural Resources for its far-sighted commitment to this long-term restoration project. Such an extensive restoration effort will require a great deal of resources to accomplish, likely beyond that which the WDNR can provide alone. The Alliance anticipates joining as a partner in working to accomplish this restoration.

Although we are pleased with the significant commitment to restoration in the Plan, the Alliance is concerned about a number of recreation proposals for the SPRA which are not compatible with restoration or with the WDNR's stated commitment to low-impact recreation on this property. We are pleased that the previously proposed ATV trail has been eliminated, but the suggested use of "dual-sport" motorcycles on equestrian and bicycle trails is equally inappropriate and incompatible, even when allowed only on a limited number of days. While the long-distance shooting range that had been proposed for the SPRA is not specifically included in this Plan, the SPRA is still under consideration for such a facility. The Alliance encourages WDNR to clearly state that a shooting range will not be built at the SPRA. The proposal for rocketry in the Plan is also an incompatible recreation activity due to noise, potential contamination, the possibility of user conflicts as well as the risk of a possible unintended fire in a grassland area. While these represent the most obvious of incompatible recreation uses, there are additional concerns detailed in the enclosed comments document.

While dual sport motorcycles, rocketry and a shooting range should clearly be eliminated from the Plan, other appropriate recreational uses could be given greater emphasis to significantly enhance the visitor experience. Primary among them are additional hiking and walking trails. The Plan specifically calls for a single, approximately five-mile long hiking trail from the proposed visitor center to the overlook at the northern edge of the property. The Plan additionally authorizes up to five additional miles of short loop hiking trails at unspecified

locations. The Alliance suggests the Plan include a well-defined, extensive hiking trail network that would allow for pedestrian access throughout the entire SPRA property.

In general, the Alliance is troubled by what appears to be an emphasis on recreation over restoration throughout the Draft Master Plan. It is likely this focus originates from the very name given to WDNR's portion of the Badger lands, the Sauk Prairie Recreation Area. In creating what is now called the SPRA more than ten years ago, the issue of which category within the WDNR's land management structure the property should be placed in was evaluated in detail. The decision was made to categorize the project as a recreation area, not because recreation was to be the primary use of the land, but because WDNR regulations permit the widest range of land management techniques on a recreation area.

In order to undertake the extensive restoration at the SPRA, a full suite of allowable management techniques under the recreation area category is necessary. An understanding of this early discussion and decision seems to have been lost. Because the category "recreation area" is included in the name of the property, the Plan focuses extensively on recreation rather than restoration. In order to resolve this misunderstanding of purpose, the Alliance suggests that the word "Recreation" be removed from the name of the property and replaced with the word "Conservation," thus *The Sauk Prairie Conservation Area*. While not changing the land management administrative category, it would more accurately portray the intent for this property to both the public and to the WDNR itself.

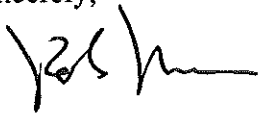
Finally, the Alliance suggests there be a greater emphasis on collaboration and cooperation with the other landowners of the former Badger Army Ammunition Plant in the creation of the final Master Plan for the portion of these lands managed by the WDNR. These include the Ho-Chunk Nation, the Dairy Forage Research Center, the Bluffview Sanitary District and the Town of Sumpter. The first value of the Final Report of the Badger Reuse Committee Report is to manage the Badger property as a single unit. WDNR was actively involved in that committee and signed the Final Report. While the Alliance recognizes WDNR has specific responsibilities for master planning and management of the lands under its control, it has also made specific commitments during the Badger reuse process to work in collaboration and cooperation on planning and management with the other Badger landowners. The expected degree of collaboration and cooperation is not reflected in the creation of this Plan nor is it apparent in the future unfolding of this Plan.

The comments in this letter, the enclosed comments document and the comments made on the Alliance's behalf from Foley & Lardner are intended to improve the Draft Master Plan. The Alliance acknowledges the difficulty of crafting a plan for a property as large and complex as the Sauk Prairie Recreation Area. We have attempted to provide thoughtful and thorough comments on the Draft Master Plan. It is difficult, however, to do so in the short 45-day period allowed for

response to such a detailed and exhaustive. If there are any questions or concerns about the Alliance's comments, we would be glad to furnish additional information.

We expect WDNR will carefully consider these and other public comments and will improve the Plan to have a more appropriate focus on restoration and compatible low-impact recreation. We look forward to a revised Plan that we can fully support for final approval by the Natural Resources Board. We anticipate that the Alliance will assist in implementing an improved plan as a fully engaged partner with the WDNR and the other Badger landowners to achieve the vision of a conservation future for the Badger lands.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Nurre', with a stylized flourish at the end.

Rob Nurre
President, The Sauk Prairie Conservation Alliance

cc:

Wilfred Cleveland, President, Ho-Chunk Nation
Mark Bogess, Director, Dairy Forage Research Center
Robin Meier, Administrator, Bluffview Sanitary District
Tim Colby, Chairman, Town of Sumpter
U.S. Senator Tammy Baldwin
U.S. Congressman Mark Pocan
Wisconsin Senator John Erpenbach
Wisconsin Assemblyman David Considine
Elyse LaForest, National Park Service

Sauk Prairie Conservation Alliance

Comments on WDNR's Draft Master Plan and Environmental Impact Statement for the Sauk Prairie Recreation Area (SPRA)

September 2015

This document summarizes the Sauk Prairie Conservation Alliance's issues and concerns with the draft master plan for the SPRA. These comments are based upon and reference the legally binding documents by which WDNR acquired the Badger property, including the Final Report of the Badger Reuse Committee (2001), the National Park Service Application by WDNR to Acquire Surplus Federal Property (2004) and the Regional and Property Analysis for the SPRA (2012).

This review is based on WDNR's pledge to use the property:

- *Focused primarily on ecological restoration and habitat management, while*
- *Providing low-impact recreation, and*
- *Only recreation that is compatible with the restoration goals.*

We offer reasoned and pragmatic alternatives (proposals for improvement) for the activities the Alliance believes are incompatible and/or inappropriate, in order to assure that the Plan closely adheres to the originating documents and WDNR's obligations and commitments contained therein.

I. Ecological Restoration & Habitat Management

The WDNR is to be commended for acknowledging the unique opportunity that SPRA represents for creating a remarkable landscape-scale ecological gradient restoration that transitions from riparian edge to open prairie/grassland to oak opening to oak woodland. The draft plan's long-term (50-year) vision for restoration of the SPRA landscape is well conceived and generally well defined. Unfortunately, the proposed recreation often pre-empts restoration, and in fact in some cases is incompatible with restoration. Priority is clearly given to recreation over habitat management, both in allocation of the land management classification and also in the proposed budget. This approach is not in agreement with the NPS application.

A. Management Area Designations within the SPRA are primarily recreational use (62%) rather than habitat or native community management (34%). Only 17 acres, 0.5

percent of the property, are classified as a Native Community Management Area, yet many acres have historically been found to contain important native species and relict native habitat. The proposed landscape management of the property targets over 90% of the land to ultimately be restored and managed as native communities.

Proposals for Improvement:

1. Place primary emphasis on ecological restoration and habitat management as the core of the SPRA Plan. Create a more equitable balance (e.g., 60-70% or more habitat management) between designated recreational and habitat management areas, and expand native community management to reflect the existence of remnant native community sites. Ideally, the property would have a landscape-scale restoration plan (90+%) within which compatible, low-impact recreation could be subsequently planned.
2. Provide a budget and proposed allocation for habitat restoration in the plan that reflects its high priority within the property. WDNR rightfully argues that immediate habitat management is essential to halt the rapid encroachment of shrubs into former grassland habitat, and an adequate up-front and continuing budget should reflect this urgency.

B. Recreation Area. It is widely understood that designating the publicly-owned property at Badger as a "recreation area" instead of a state park, wildlife area or other public land designation, gave the agency greater flexibility to plan and support ecological restoration while also planning for low-impact and compatible recreation. However, the recreation focus in the Plan has a much greater emphasis than the restoration component. Numerous "I want this" recreation proposals from small special interest groups have continued to creep into the planning process for this property, even up to and including this last draft of the master plan. This property's unique opportunity to vitally function as a restored grassland supporting rare grassland birds and as an Important Bird Area is almost negated if the property serves as a recreation area responding to all special interests.

Proposal for improvement: While the recreation area designation will undoubtedly remain in place, the NAME of the property can be changed to better reflect the ecological value of the site. For example, changing the name to "Sauk Prairie CONSERVATION Area" would be appealing and appropriate, and would fit nicely with the adjoining and nearby protected landscapes. As the Ho-Chunk Nation is considering naming its northwest section of Badger, WDNR should join the Nation in conversation to consider sharing a Native name. This would serve to begin fulfilling Value 1 of the Badger Reuse Committee Report, i.e., to treat the property as a whole.

II. Recreation

Many of the Plan's recreation activities are low-impact and in compliance with WDNR's commitment for use of the property. Some proposed recreation options are high-impact and should be eliminated completely from the Plan. Other proposed recreation activities may be incompatible with ecological restoration and even incompatible with low-impact and "silent" recreation activities. The draft plan appears to be a "catch all" for many types of recreation not permissible in a state park, and special interest groups' pet recreational activities have been inserted into the Plan. Many proposed uses, therefore, are incompatible with other uses. The most ignored users—and arguably the best represented from a demographic perspective—are the many individuals and families who will come to the SPRA for a quiet, peaceful experience in an open grassland landscape. Whereas generally our environment is filled with noise and commotion, solitude and quiet can still be found in a vast prairie. That is the opportunity and attraction of a landscape of this acreage. The Plan, if implemented as it is written today, would greatly impede the quiet appreciation of the SPRA by the majority of users.

A. High Impact Recreation

1. A proposal for a **shooting range** was evaluated more than a decade ago by the Badger Reuse Committee and was scored low according to the consensus criteria. A shooting range was again considered as a recent conceptual alternative for the SPRA. This proposed use of the land is contrary to WDNR's commitment to low-impact recreation, and widespread public sentiment was clearly opposed to a shooting range at SPRA for over a decade.

Proposal for improvement: No further consideration should be given for a shooting range at any time in the future for the SPRA.

2. **ATVs** were initially considered as a conceptual alternative for the SPRA. ATVs clearly represent a high-impact use of the property, and as such, are inappropriate and incompatible with other uses.

Proposal for improvement: No further consideration should be given for ATVs at any time in the future for the SPRA.

3. **Dual-sport motorcycles** are arguably loud, disruptive and can have as much impact on the land (e.g., soil erosion) and the quality of other visitors' experience as ATVs. Motorcycles were never considered as an acceptable recreational activity during the early planning stages at Badger. No matter how limited the proposed use of the property by off-road motorcycles, this is an incompatible high-impact activity that is inappropriate for SPRA. Allowing motorcycle use on trails, even for a short time frame, would keep the door open to increased motorcycle use in the future of the property.

Proposal for improvement: Remove all reference to dual-sport motorcycles in the final SPRA master plan.

4. **Model and High Power Rockets** are a high-impact recreation activity with certain inherent risks. Shooting propellant-fueled rockets from and into a grassland could cause a spontaneous fire upon ignition. Whereas that may be good for the prairie, it represents a significant liability issue for WDNR. Were an errant rocket to land on neighboring DFRC property, permission to access DFRC land to retrieve rockets is not guaranteed, and occasional visitors to SPRA may not be aware of access restrictions elsewhere at Badger.

Proposal for improvement: Remove all reference to rockets from the Plan as an incompatible, high-impact and potentially harmful activity.

5. **Snowmobiles** represent a noisy, high-impact motorized recreational activity and should not be considered as appropriate for the SPRA. The Alliance acknowledges the existence of a historic snowmobile route on the perimeter of the Badger property and would accept formal designation of that trail for land owned by the state. Use of the Great Sauk Trail that runs through the middle of Badger is not acceptable as a snowmobile route. There could easily be snowmobile user conflicts on Ho-Chunk and Dairy Forage Research Center properties.

Proposal for improvement: Support the BOMC-endorsed creation of a permanent snowmobile trail along the perimeter of the SPRA and oppose any snowmobile trail suggested for the interior of the Badger property on or adjoining the Great Sauk Trail.

6. **Wisconsin National Guard Helicopters.** The training flights by Wisconsin National Guard helicopters over and landing on the SPRA are not recreational and are a high-impact activity within the property. Furthermore, the flights may be in direct conflict with recreational users on the SPRA, especially those individuals who enjoy "silent sports" and who desire a quiet peaceful place to get away from urban noise. Furthermore,

there are inherent risks in flying military aircraft over a publicly used landscape. Finally, the Plan does not reference any environmental impact analysis of military activities (e.g., flight paths, noise, soil disturbance, dust, night operation, safety concerns, and procedures in case of a crash).

Proposal for Improvement: WDNR should no longer allow military helicopter flights over the property once the master plan has been approved. Should WDNR decide to continue to allow helicopter flights, the agency should collaborate with the Guard on development of an extensive environmental document (EA or ER) to assess the impacts of military use of the SPRA and enter into an agreement that limits use and mitigates impacts based on the EA.

B. Other Recreation

1. **Hunting.** The proposed hunting season for the entire property is October 15 to May 26, corresponding with the end of the six turkey seasons. SPRA is not a wildlife area, but a recreation area. The use of the property by those seeking silent recreational endeavors should not be compromised by fear of interactions with hunters nearby nor the sound of gunfire throughout an extended hunting season. The sound of gunfire carries a considerable distance over an open grassy landscape; WDNR has not shown that it has undertaken acoustic studies to determine the impacts of hunter gunfire to the experience of other users on the property.

Proposal for Improvement: Limit hunting season on the property from November 15th until May 1st. This more abbreviated hunting season allows for all fall and spring hunting with the exception of three turkey seasons, while simultaneously accommodating outdoor recreationists (bikers, hikers, horse riders) during some of the best times of year—fall and spring—who desire a quiet and peaceful natural experience.

2. **Dog Training.** A 72-acre dog training area is proposed for the farthest southwesterly area of the Magazine Area adjoining DFRC land, but there has been no presentation of need in any Badger land management or planning forum for such an exclusive use area. Dog training/trialing was never considered through the 18 years of planning at Badger. Therefore, this new proposal appears to be inserted to appeal to a late-entry special interest group. This activity requires the discharge of firearms with every training event, which can, according to the Plan, “provide a high-quality, year-round experience” on the site. The Alliance sponsored an acoustic study in 2014 which concludes that grassland bird nesting may be negatively impacted by the shooting of

firearms. DNR has not evaluated the potential impacts of gunfire noise on nesting birds, nor has it done its own acoustic study to determine the impact to "silent sport" recreationists elsewhere on the property. Consideration needs to be given to the impact of gunfire upon grazing cattle on the adjoining DFRC property. Another consideration is gunfire impact on unleashed dogs adjoining the training site. Many dogs are expressly alarmed at gunfire, and tend to flee from loud noises. At the present time two adequate dog training/trialing areas exist within 20 miles of the Badger property (Mazomanie & Pine Island, both with vast acreages). Obviously there is more than adequate opportunity in the area for dog trainers in southern Wisconsin.

Proposal for Improvement: Remove the proposed dog training area from the Plan until WDNR undertakes a thorough needs analysis and an acoustic assessment of noise impacts on rare grassland species, visitors and unleashed dogs. Include a proposal for seasonally limited dog training only after impacts are assessed and only if DFRC concludes that dog training represents no conflict to their operation. Restrict dog training to dates outside of grassland bird nesting season and to the more limited hunting season proposed.

3. **Mountain Bikes.** Mountain bikes can have a significant and adverse impact on trails, causing erosion on steep grades and certain soil types. The draft plan offers no consideration for analyzing potential negative short-term and cumulative impacts of mountain bikes, nor is there a process in place to review and mitigate any future cumulative impacts due to the use of mountain bikes.

Proposal for Improvement: The Plan needs to demonstrate that the agency has studied the potential cumulative impacts from mountain bikes and has included a process to review and mitigate those impacts if they occur. If mountain biking is included in the final plan, care should be taken to avoid the steepest slopes and the most erodible soils on the property. Mountain bikers will undoubtedly want any SPRA trail(s) to continue into Devil's Lake State Park, and any planned trails should be done with an eye toward this future request and potential impacts.

4. **Horses.** As with mountain bikes, horses can also have adverse impacts on trails, especially after a rain event when hooves can tear a grassy substrate and lead to soil erosion and muddy pockets on the trail. Invasive species often are spread on horse trails by seeds carried in horse droppings. The plan does not consider the cumulative impacts of horses on trails, nor does it address a process for mitigating damage done by horses.

Proposal for Improvement: The Plan needs to demonstrate that the agency has studied the potential cumulative impacts from horses and has included a process to review and mitigate those impacts when they occur. Any horse trails included in the final plan should avoid the steepest slopes and the most erodible soils on the property. If horse trails become badly eroded, WDNR should be prepared to close trails indefinitely, or until the damage has been mitigated.

5. **Special Events.** The Alliance is pleased that WDNR staff described, at the September 10, 2015 public hearing, some possible special events that might be considered for approval on SPRA. As written, special events may be proposed for a portion or all of the SPRA. A special event permit would exclude all other users of that portion of SPRA for up to five, four-day weekends a year, or potentially more days if some events are held on weekdays. Exclusive use given to a special interest group is inherently unfair and unjustifiable, as it would block general public access to a portion of the property for the normal suite of recreation uses. The Alliance has a 17-year history of helping with management and restoration of the "Hillside Prairie" within the Magazine Area that is designated in the Plan for special events. It is very possible that volunteer work days at the Hillside Prairie could be in conflict with proposed special events, and access to the volunteers could possibly be denied. With limited staff, extremely limited funding and an admission that WDNR will not oversee special events, WDNR should simply avoid inclusion of any special events in the Plan. The agency's limited resources are better used for its core mission: to protect and enhance our natural resources.

Proposal for Improvement: The Alliance disagrees fundamentally with the creation of any and all "exclusive use" areas on the SPRA, as that would limit citizen access to portions of the property on any given day. Some individuals may prefer spending time in the Magazine Area, and they have the right to do so. "Special events" are of extremely questionable value to this property and could conflict with other acceptable recreational uses. Reference to a special events area should be eliminated from the Plan. Instead, the Magazine Area in its entirety should be incorporated into the diverse trail system proposed for the other segments of the SPRA, with a focus on hiking trails. If WDNR elects to keep special events in the Plan, it should also include a listing of specific acceptable special events and WDNR should strictly adhere to those limited uses. Furthermore, special events should be limited to no more than a total of 6 days/year.

6. **Hiking Trails.** While it is understood that the placement of trails in the draft master plan is conceptual only, the Plan gives disproportionate priority emphasis to proposed horse and street bike trails over hiking trails. It is perhaps assumed that hikers will want

to walk on horse trails or street bike trails, but this may not necessarily represent the interests of the hiking population. There can be conflicts and unsatisfactory visitor experiences if different types of users (e.g., hikers & horses) are on the same trails; hikers may tend not to use trails used by horses or bikes. Hikers undoubtedly will represent the largest demographic of users at Badger, as is observed at Devils Lake State Park and virtually all state parks in Wisconsin. One of the original goals with the WDNR's unusually-shaped property was to connect Lake Wisconsin to the Baraboo Bluffs, and eventually to Devil's Lake. That corridor should support a hiking trail network, providing access to all segments of the SPRA property. Arguably, hiking trails are the easiest to build and maintain compared to other trails. In light of a very limited anticipated budget for the property, WDNR could accommodate a large number of recreationists at SPRA for modest funding by planning a lengthier hiking trail network.

Proposal for Improvement: Expand the number of miles of hiking trails, and develop an extensive network of hiking trails that are independent from other trail uses. Additionally, due to the large size and potential isolated recreational experiences at the SPRA, manage at least some areas for the more primitive types 1 and 2 recreation.

7. **Drones.** Although the use of drones is, for the time being, not allowed on state land, the possibility exists that this recreational use, becoming ubiquitous across the country, will experience a groundswell of support and an interest in flying drones at the SPRA.

Proposal for Improvement: WDNR should be pro-active in anticipating this potential (inevitable?) future recreational interest at SPRA and include reference to a clear process and procedure for reviewing and evaluating any such proposed drone use on the property. There could be potential harm to grassland nesting birds, for example, if drones are flown during the breeding season.

III. Infrastructure & Management

A. Visitor Center/Office. The 2001 Badger Reuse Plan, to which the WDNR is a signatory, very specifically states that the Badger lands, whoever their eventual owners might be, should be *managed as a single, cohesive property*. In its application to the National Park Service, the WDNR stated it would plan for the entire Badger lands and not just their own portion of the property. The WDNR's plan for the SPRA is a stand-alone document that includes few references to the plans of other Badger landowners. There is little reference to future collaboration with other landowners on issues of mutual interest. The most obvious omission is lack of consideration for a combined visitor center/museum to serve visitors to all of the

Badger lands. The Badger Reuse Committee, in its Final Report (2001), envisioned a single “centralized museum/visitor center and multi-use educational facility” to serve the needs of all future landowners and their constituent visitors.

Proposal for Improvement: WDNR needs to partner with Ho Chunk Nation and the Dairy Forage Research Center, to plan, seek funding for, and construct a large centrally located, easily accessible visitor center /museum with extensive interpretive exhibits and adequate office space for each landowner. Clear reference to such a collaboration should be included in the final plan.

B. Parking Area/Amphitheater. The draft plan proposes a large parking area (50 spaces) and amphitheater at the most northern portion of the SPRA property, near the water reservoirs. Understandably, the removal of the reservoirs will ultimately leave a large gap, but a large parking lot is not an imaginative use of this special site. Certainly, there will be visitors interested in visiting the overlook area, but it is unclear that many people would drive the distance to attend an event at such a remotely sited amphitheater.

Proposal for Improvement: An amphitheater, if deemed necessary, could be better sited adjoining or near the visitor center, wherever that is eventually located. Similarly, a larger parking area should be planned for near a (shared) visitor center with a concurrent reduction in the size of the parking area where the reservoirs are now.

C. Budget. The draft plan offers only limited clarity of potential costs, and the costs of restoration are not expressly and clearly stated.

Proposal for Improvement: The final plan should include a well-defined budget that clearly demonstrates priority activities, staffing needs, infrastructure and a timetable for implementation. Arguably, as WDNR has identified, extensive restoration work needs to be implemented in a short time span to begin to address the encroachment of aggressive invasive shrubs into grassland habitat. This should be given high priority, even before recreation infrastructure is put in place. The budget and timeline should reflect this priority.

D. Collaboration. While this draft plan addresses some opportunities for problem solving with adjacent land owners, Ho-Chunk Nation and Dairy Forage Research Center (e.g., Otter Creek flood issues), it neglects to include and identify plans for landscape-scale collaboration on a multitude of activities, together with the co-

owners of the Badger lands. Most importantly, it does not fulfill one of the primary conditions of the transfer of this property, to manage the property as a whole.

Proposal for Improvement: Develop a clear and thoughtful new section of the Plan that addresses areas of collaboration with the other landowners at Badger, thereby treating all 7,400 acres as a property of the whole. This narrative and plan should include property-wide planning of infrastructure (roads, trails, visitor center, interpretation sites, etc.), ecological restoration, scientific and historical research, and education, among other shared themes and interests.

Each of the suggested improvements that we offer to WDNR's draft master plan will benefit the people of Wisconsin and this unique property. We whole-heartedly support and endorse WDNR's statement in the Plan:

"Based on this report's findings, the best overall functional role for the Sauk Prairie Recreation Area is to fulfill the highlighted ecological opportunities available while maximizing compatible recreation opportunities. This approach also takes into consideration the nine key values identified in the Badger Reuse Plan, approved by the Sauk County Board in 2001."

We concur with WDNR's acknowledgement of the once-in-a-lifetime opportunity this property represents to the citizens of Wisconsin. We should not view ourselves as consumers of this landscape, but rather as its caretakers. It is our responsibility to heal this land that has been so mistreated in the past. We stand with WDNR to fulfill this landscape's highest and best ecological opportunities while offering low-impact recreation to our many citizens.